

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION**

In re:

Case No.: 3:16-bk-02230-PMG

RMS TITANIC, INC., *et al.*,

Chapter 11

## Debtors.<sup>1</sup>

**(Jointly Administered)**

**NOTICE OF DEPOSITION OF CORPORATE REPRESENTATIVE  
OF GLASSRATNER ADVISORY & CAPITAL GROUP LLC**

**PLEASE TAKE NOTICE** that at **12:00 p.m. on Friday, August 24, 2018**, counsel for  
Official Committee of Equity Security Holders of Premier Exhibitions, Inc., Chapter 11 Debtor  
in Case No. 3:16-bk-02232-PMG and the parent company of RMS Titanic, Inc., the Chapter 11  
Debtor in Case No. 3:16-bk-02230-PMG will take the testimony by deposition upon oral  
examination of GlassRatner Advisory & Capital Group LLC ("GlassRatner") at the offices of  
GlassRatner, 3445 Peachtree Rd NE, Unit 1225, Atlanta, Georgia 30326, pursuant to Rule 30 of  
the Federal Rules of Civil Procedure, made applicable by Rule 7030 of the Federal Rules of  
Bankruptcy Procedure.

The deposition will take place before an officer authorized by law to administer oaths for the purposes of discovery, for use as evidence at any hearing or trial and for any other purposes allowed under Federal Rules of Civil Procedure and Federal Rules of Bankruptcy Procedure. The deposition will be recorded by stenographic means.

<sup>1</sup> The Debtors in the chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number include: RMS Titanic, Inc. (3162); Premier Exhibitions, Inc. (4922); Premier Exhibitions Management, LLC (3101); Arts and Exhibitions International, LLC (3101); Premier Exhibitions International, LLC (5075); Premier Exhibitions NYC, Inc. (9246); Premier Merchandising, LLC (3867); and Dinosaurs Unearthed Corp. (7309) (collectively, the "Debtors"). The Debtors' service address is 3045 Kingston Court, Suite I, Peachtree Corners, Georgia 30071.

Pursuant to Federal Rule of Civil Procedure 30(b)(6), as made applicable to this matter by Federal Rules of Bankruptcy Procedure 7030, GlassRatner shall designate one or more officers, directors, managing agents or other persons to appear and testify on its behalf concerning the matters set forth below. The individual(s) designated shall testify to matters known or available to GlassRatner.

### **TOPICS FOR RULE 30(b)(6) DEPOSITION**

1. All documents produced by GlassRatner Advisory & Capital Group LLC in response to the Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Bankruptcy Case issued by the Official Committee of Equity Security Holders.
2. The Asset Purchase Agreement, including among other things, the proposed Bidding Procedures Order, the Bid Procedures, and other Bid Protections (collectively, the "Sale Procedures") set forth therein and attached as exhibits to the Motion for Approval of (a) Competitive Bidding and Sale Procedures; (b) Form and Manner of Notices; (c) Form of Asset Purchase Agreement; (d) Break Up-Fee and Expense Reimbursement; (e) Scheduling Auction and Hearing to Consider Final Approval of Sale, Including Rejection or Assumption and Assignment of Related Executory Contracts and Unexpired Leases; (f) Authorizing Sale of the Transferred Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests; (g) Settlement with PacBridge Parties; and (h) Granting Related Relief (Doc. 1055) filed by Debtor RMS Titanic, Inc. (the "Sale Motion").
3. Negotiations and other communications that led to the Asset Purchase Agreement and the Sale Procedures set forth in the Sale Motion and other related matters.
4. Negotiations and other communications with Gilbert Li and other Alta Fundamental Advisers LLC representatives and agents related to the Asset Purchase Agreement and the Sale Procedures set forth in the Sale Motion and other related matters.
5. Negotiations and other communications with Giovanni Wong and other PacBridge (Capital Partners (HK) Ltd) representatives and agents related to the Asset Purchase Agreement and the Sale Procedures set forth in the Sale Motion and other related matters.
6. Negotiations and other communications with Bill Schwartz and other Apollo Global Management, LLC representatives and agents related to the Asset Purchase Agreement and the Sale Procedures set forth in the Sale Motion and other related matters.

Date: August 15, 2018

By: /s/ Peter J. Gurfein

Peter J. Gurfein

**LANDAU GOTTFRIED & BERGER LLP**

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-and-

**AKERMAN LLP**

By: /s/ Jacob A. Brown

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Attorneys for the Official Committee of Equity  
Security Holders of Premier Exhibitions, Inc.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 15, 2018, the foregoing was transmitted to the Court for uploading to the Case Management/Electronic Case Files ("CM/ECF") System, which will send a notice of electronic filing to all creditors and parties in interest who have consented to receiving electronic notifications in this case. In accordance with the Court's Order Granting Debtors' Motion for an Order Pursuant to 11 U.S.C. § 105(a) and Rule 2002 Establishing Notice Procedures (Doc. 140), a copy of the foregoing was also furnished on August 15, 2018 by U.S. mail, postage prepaid and properly addressed, to the Master Service List attached hereto.

/s/ Jacob A. Brown

Attorney

**MASTER SERVICE LIST**  
***Case No. 3:16-bk-02230-PMG***

A-1 Storage and Crane  
2482 197th Avenue  
Manchester, IA 52057

ABC Imaging  
14 East 38th Street  
New York, NY 10017

A.N. Deringer, Inc.  
PO Box 11349  
Succursale Centre-Ville  
Montreal, QC H3C 5H1

ATS, Inc.  
1900 W. Anaheim Street  
Long Beach, CA 90813

Broadway Video  
30 Rockefeller Plaza  
54th Floor  
New York, NY 10112

CBS Outdoor/Outfront Media  
185 US Highway 48  
Fairfield, NJ 07004

Dentons Canada LLP  
250 Howe Street, 20th Floor  
Vancouver, BC V6C 3R8

Enterprise Rent-A-Car Canada  
709 Miner Avenue  
Scarborough, ON M1B 6B6

Expedia, Inc.  
10190 Covington Cross Drive  
Las Vegas, NV 89144

George Young Company  
509 Heron Drive  
Swedesboro, NJ 08085

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Vancouver, BC V6C 2B5

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305 Crosstree Lane  
Atlanta, GA 30328

Kirvin Doak Communications  
5230 W. Patrick Lane  
Las Vegas, NV 89118

MNP LLP  
15303 - 31st Avenue  
Suite 301  
Surrey, BC V3Z 6X2

Morris Visitor Publications  
PO Box 1584  
Augusta, GA 30903

NASDAQ Stock Market, LLC  
805 King Farm Blvd.  
Rockville, MD 20850

National Geographic Society  
1145 - 17th Avenue NW  
Washington, DC 20036

NYC Dept. of Finance  
PO Box 3646  
New York, NY 10008

PacBridge Limited Partners  
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19-20 Connaught Road  
Central Hong Kong

Ramparts, Inc.  
d/b/a Luxor Hotel and Casino  
3900 Las Vegas Blvd. South  
Las Vegas, NV 89119

Seaventures, Ltd.  
5603 Oxford Moor Blvd.  
Windemere, FL 34786

Syzygy3, Inc.  
231 West 29th Street  
Suite 606  
New York, NY 10001

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